

**From:** Broderick, Joanne - OASAM [Broderick.Joanne@dol.gov]  
**Sent:** Monday, November 19, 2007 11:28 AM  
**To:** Darton, Terry

**Dear Mr. Drayton:**

**I do not support the continued operation of a coal fired plant in a residential community such as the North Town area. Mirant has been in flagrant violation of pollution control standards. Emission limits are excessively high, do not protect public health, and worsen air quality and jeopardize public health. Any license that would allow the Mirant plant to increase emissions is unacceptable. Variable emission limits should not be permitted. Pollution controls must be optimized at all times. Trona public health impact must be evaluated. The draft permit, in its present form, allows the Mirant plant to significantly increase emissions back to historically high levels due to excessively high PM and NO emission limits.**

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1. Should Continuous Emission Monitoring Systems be required for all Particulate Matter regulated by the Regulations for the Control and Abatement of Air Pollution and (1) does the Environmental Protection Agency (EPA) have an approved methodology for these systems, and (2) has the EPA certified an instack instrument for this purpose?

PM CEMS should be required as part of this SOP for compliance purpose. PM has been the pollutant of concern for the community. With the use of trona, opacity data shows significant potential for increased PM emissions. The technology to install PM CEMS is commercially available and the immediate installation of CEMS should be a requirement of this permit.

2. Should the operating performance of the control equipment for sulfur dioxide (SO<sub>2</sub>) be the basis for permit limitations rather than the array of operating scenarios?

The operating performance of the control equipment for sulfur dioxide should be the basis for permit limitations for all operating scenarios (rather than different limits for the array of operating scenarios). In addition, the limits must be protective of NAAQS. Mirant should optimize its pollution control devices at all times to minimize emissions and the impacts to the population and environment.

3. Are the varying SO<sub>2</sub> control rates considered intermittent controls?

Varying SO<sub>2</sub> control rates would be considered intermittent controls which are prohibited

under federal and state regulations (40 CFR 51.100(nn), 40 CFR 51.100(hh)(1)(ii) and 9 VAC 5-10-20) City strongly objects to any permit that allows Mirant PRGS to use intermittent controls to show compliance with NAAQS.

4. Should permit emission rates for SO<sub>2</sub> be established to ensure the use of Trona (or other sorbent materials), and should the proposed minimum sulfur content requirement be eliminated?

The permit emission rates for SO<sub>2</sub> should be established to ensure the optimal use of trona at all times. The proposed minimum sulfur content requirement can be eliminated from the permit, but the maximum sulfur content of coal should not be relaxed and should stay at 0.9%. Relaxing this would mean more trona use, and thus PM emissions.

5. Should the Clean Air Interstate Rule and Clean Air Mercury Rule requirements be included in the permit?

The Clean Air Interstate Rule (CAIR) and Clean Air Mercury Rule (CAMR) requirements should be included in the permit since they are federally enforceable. Also, the more stringent limits (the proposed limits and CAIR/ CAMR) that are protective of NAAQS must be the permit limits. For instance, the present SO<sub>2</sub> limit of 3,813 tons per year is more stringent than the CAIR limit and should stay. Likewise, the CAIR NO<sub>x</sub> limit of 1,734 tons per year should be the limit for this permit when it becomes enforced in 2009.

6. What changes should be made to the architecture of the permit and the emission limits in the proposed permit?

The NO<sub>x</sub> and PM emission limits must be much more stringent to protect the NAAQS and public health.

7. What changes or additions should be made to the proposed parametric monitoring and (1) does such monitoring obviate the need for Particulate Matter Continuous Emissions Monitoring Systems and (2) what is the commercial availability of these instruments?

The proposed parametric monitoring is not adequate to ensure good ESP performance at all times since it cannot readily detect unforeseen operating difficulties as well as changing particulate loading at the inlet of these devices. Thus, it cannot replace the use of PM CEMS which directly measure PM emissions. As noted above, the commercial availability of these PM CEMS are abundant since these devices have been used in Europe since the 1970's, and more recently in US. In particular, the beta gauge PM CEMS is the closest to the Federal Reference Method for particulates in terms of measurement accuracy.